

# PURPOSE IN ACTION

2022 ESG Report





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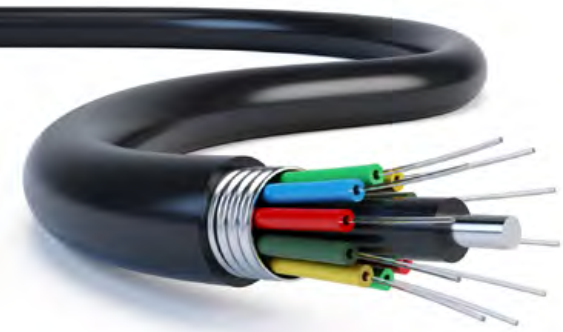
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## About This Report

This is our second ESG Report, detailing how we delivered on our purpose and environmental, social and governance (ESG) commitments in 2022.

Our ESG strategy continues to guide how we operate as a purpose-led organization. As a testament to our commitment to our ESG journey, we continue to report toward global ESG standards, including the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board’s (SASB) standards for the Telecommunication Services sector. Our annual progress reports will both celebrate and guide our actions toward our ESG goals.

Information and data reflect the fiscal year ended December 31, 2022, unless otherwise noted.

# FROM OUR CEO

## Our Purpose in Action

2022 marked a turning point in our company's history. It was the first full year of our turnaround, and we translated our purpose into action. Our mission is clear—to Build Gigabit America—and it defines our level of ambition and the importance of our work as we construct the digital infrastructure that will propel our nation forward in the 21st century.

Our transformation began with our people. To rebuild our company, we started from the inside out. We fostered a culture where everyone can contribute to our success, and we put that philosophy into practice last year. By breaking down physical walls and creating open-plan, office-free spaces, we improved collaboration and ensured that information flows freely throughout

the company. This enabled us to break down silos and give everyone a voice.

One of our most significant achievements last year was launching the Red Loves Green program. This initiative reflects our commitment to creating a sustainable future. We turned employees' ideas into actions and have already reduced over 1,000 tons of physical waste in less than a year.

With everyone focused on Building Gigabit America™, our purpose has driven our performance. We accomplished everything we set out to do last year, building more fiber than ever before and connecting more people, communities and businesses to our blazing-fast fiber internet than at any other time in our company's history. Over five million

homes and businesses now have access to high-speed fiber internet service and all the opportunities that come with it.

As we grow, we recognize our responsibility to society. We believe in inclusion, both digital and physical, and have taken action to strengthen the communities we serve. Broadband for Good is our way of giving back, using our superpower—fiber technology—to advance digital inclusion and connect the unconnected. We're proud to have already made a difference in the lives of those we serve, such as the Boys & Girls Clubs of the Brazos Valley in Bryan, Texas. By providing high-speed broadband and equipment for their computer lab, we've enabled them to provide a safe place to learn, grow and play to those who would otherwise be excluded.

I'm proud of our team for prioritizing this work right from the start of our transformation. We're building an extraordinary company for our people and a better, connected future for the communities we serve. Building Gigabit America is our purpose, our commitment to ESG, and it's becoming the DNA of Frontier.

*Nick*

**Nick Jeffery**  
President & CEO





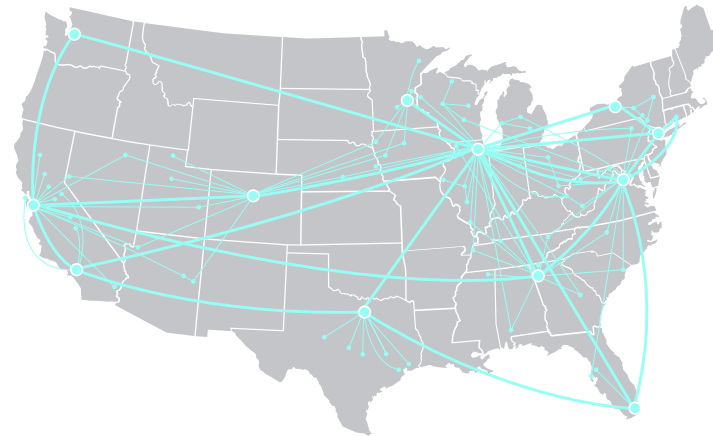
# ABOUT FRONTIER

We bring our purpose of Building Gigabit America to life by supporting a digital society, closing the digital divide and caring for the environment.



# WHO WE ARE

Frontier is leading the “un-cable” revolution. Driven by our purpose, Building Gigabit America™, we are relentless in our pursuit of always delivering a better customer experience. Providing digital infrastructure that empowers people to create the future, we’re connecting millions of consumers and businesses in 25 states with reliable fiber internet and multi-gigabit speeds.



**“Frontier is Building Gigabit America. We are deploying fiber and connecting people to the digital society at a record pace. Our team’s operational discipline over the last year has improved Frontier’s financial trajectory and positioned us as the preferred digital partner for customers across our footprint.”**

– Nick Jeffery, President and Chief Executive Officer

## Frontier at a Glance

Largest U.S.  
**pure-play**  
fiber company

**2.8M**  
broadband customers

**25**  
states served

**180,000**  
mile advanced fiber network

**~14,700**  
team members

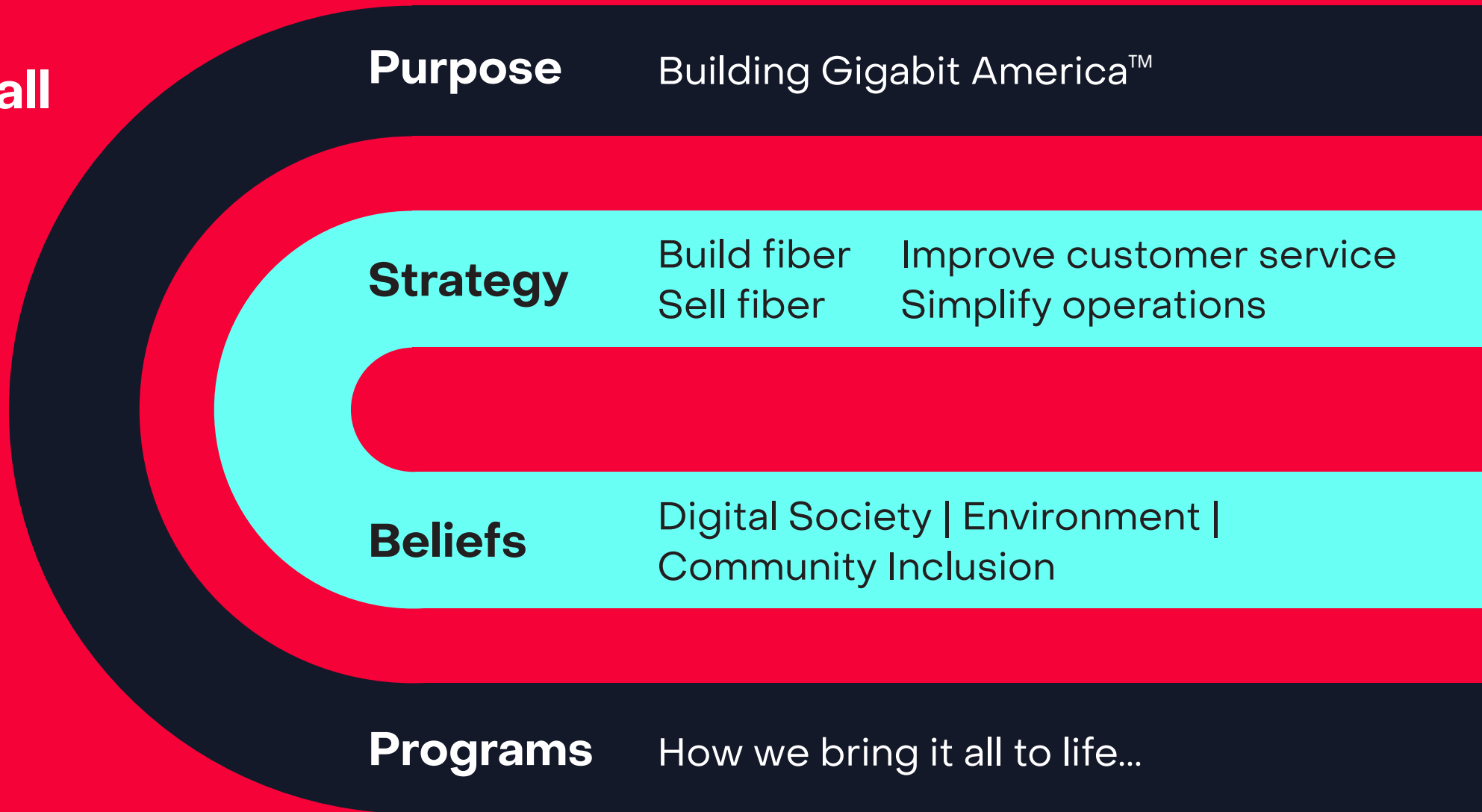
**Diverse**  
Board and leadership team

**5.2M**  
fiber locations reached in 2022,  
halfway to our target of

**10M fiber locations**

Our Purpose

**Bringing it all Together**



**Purpose**

Building Gigabit America™

**Strategy**

Build fiber    Improve customer service  
Sell fiber    Simplify operations

**Beliefs**

Digital Society | Environment |  
Community Inclusion

**Programs**

How we bring it all to life...

# OUR COMMITMENT TO ESG

## Defining Our Material Issues

In 2021, we identified the ESG priorities most important to our business success, reflecting the topics of highest priority to us and to our stakeholders. This prioritization guides our ESG efforts as we evolve our sustainability strategy and disclosure priorities. We identified five material issues, which we address in this report:



Diversity,  
equity and  
inclusion



Greenhouse  
gas emissions  
and energy



Talent  
engagement



Workplace  
health and  
safety



Data  
security and  
privacy

We also identified seven important issues, listed in alphabetical order, that are foundational to our business. Although these issues do not reach the same level of materiality as our five main issues, they play an important role in the success of our business and our impact on society, and we will continue to address them. These issues include:

- **Community engagement and economic opportunity**
- **Competitive behavior**
- **Corporate governance**
- **Human rights and labor**
- **Network reliability**
- **Product end-of-life and recycling**
- **Systemic risk management**



## 2022 ESG Highlights

2022 was a pivotal year as we strengthened our ESG commitment in almost every aspect of what we do at Frontier.



### Reducing Our Carbon Footprint

We launched our Red Loves Green program to reinforce our commitment to sustainability. One of the pillars of the program is greening our fleet, beginning with providing EV-powered installation vehicles in Torrance, California.

By the end of 2023, we will add more e-transit vans to facilities in Connecticut, Florida and Texas with the goal of having at least 25 percent of our urban installation and maintenance vans fully electric by the end of 2025.



### Community Inclusion

We launched Broadband for Good, our social impact program that uses our fiber technology to address critical connectivity needs, increase inclusion and bridge the digital divide.

Our first recipient, the Boys and Girls Clubs of the Brazos Valley, received free high-speed broadband connectivity and computer equipment to support local youth.



### Transforming Together

We're transforming from the inside out to create an exceptional workplace that values diversity, fosters collaboration and encourages feedback.

In 2022, we hired our first Head of DEI to drive this commitment forward and launched Changemakers, a new recognition program. Our purpose of Building Gigabit America is shaping a culture where everyone feels heard and included in driving our successful turnaround.



# ENVIRONMENTAL



At the core of Building Gigabit America is our commitment to creating a more sustainable future. Red Loves Green is our commitment to sustainability in the technology we use, the way we do business and the digital connections we enable for our customers.



# RED LOVES GREEN – FOUR PILLARS

## Building Energy-Efficient Fiber Networks

Our fiber-optic technology requires less energy than broadband alternatives and will also help our customers reduce their environmental footprint.



## Establishing Frontier Green Initiatives

We are reducing our energy consumption through real estate consolidation, upgrades and digitizing our operations.



## Greening Our Fleet

We are using new technologies and purchasing more electric vehicles (e.g., electric-powered installation and maintenance vans and e-transit vans).



## Reducing Our Carbon Footprint

We are measuring our carbon footprint, establishing emission reduction goals and investing in renewable energy sources and strategies.



# BUILDING ENERGY-EFFICIENT FIBER NETWORKS

Fiber-optic technology is by far the most energy-efficient broadband technology. Not only does fiber provide consumers with the fastest possible internet speeds, it is also better for the environment than copper broadband. It uses more sustainable materials, has a smaller carbon footprint and reduces waste and pollution.

Given that the internet currently accounts for 3.7 percent of global carbon emissions,<sup>1</sup> a figure projected to double by 2025, fiber networks help decrease the internet's carbon impact.

In 2021, we launched a fiber-first strategy driven by our purpose of Building Gigabit America to expand to 10 million fiber locations. As of year-end 2022, we have reached 5.2 million locations with fiber.



**“We are delivering our fiber-first strategy at a record pace knowing the critical role that we play in connecting communities. It’s impressive to see our teams and external partners come together to accelerate our fiber build despite the challenging environment.”**

– Veronica Bloodworth, Chief Network Officer

## More Fiber Means Less CO<sub>2</sub>

Fiber reduces carbon emissions.<sup>2</sup> Estimates of Fiber To The Home CO<sub>2</sub> impact can result in reductions of 50,056 kilotons annually, the equivalent of taking 10.8 million vehicles off the road.

Equal to nearly

**11 MILLION**  
vehicles off the road annually



<sup>1</sup> Source: BBC

<sup>2</sup> Source: Fiber Broadband Association

**SPOTLIGHT**

## A Round of Applause for Our Hurricane Heroes

Our people are the heart of Building Gigabit America, and they work hard every day to keep our customers connected during both times of joy and tragedy. We're thankful for each team member who went above and beyond to serve our customers after Hurricane Ian.

While Ian's winds were battering the coast, **Lakisha Roundtree** and **Bob Welch** sheltered in place at one of our critical facilities in Tampa, Florida, during the worst of the hurricane. They put everything aside to be on hand to act at a moment's notice.

**Steve Wilson** and **Fred Fedornak** teamed up after learning that the Land O'Lakes generator didn't come online after a commercial power failure in the area. Steve and Fred responded immediately to make sure the office was stable and back on commercial power.

**Ebson Parrish**, a volunteer with Manatee County's Search and Rescue team, was at the wheel when the team sent its tactical vehicle to help deliver water throughout the community.



## Fiber's Resilience Withstands Extreme Weather

Fiber-optic technology is more resilient than other broadband technologies. The fiber bundle is wrapped in thick cladding and further insulated inside a buffer layer to protect it from water, weather and temperature extremes.

When Hurricane Ian disrupted service across several counties in Southwest Florida in September 2022, the impact to our underground system and damage to our network was less severe because of our infrastructure and our network was back online faster than cable and wireless networks.



## Copper Decommissioning

We have taken significant steps to decrease copper's negative environmental impact, minimize unnecessary costs and still meet the critical connectivity needs of our customers through our copper decommissioning program.

If a customer in the area is currently using our copper network, they can often be upgraded to fiber at no cost and the copper wiring they were using will be assessed for the best environmentally sound disposal, recycle or reuse options. To date, we have retired copper for approximately 348,000 addresses across our footprint.

## Saving Energy and Saving Money

Through our Switch Degrow program, we have been reducing the carbon footprint of our central offices. Switches, especially the older ones, consume significant amounts of energy. To reduce this load, we are consolidating our network switches across our wire centers to remove redundant or outdated equipment to reduce our energy usage. The program has reduced 4.7 million kWh annually, saving 2,705 tons of carbon. Because of Switch Degrow, we have saved more than \$7.6 million since the program's inception in 2018.

# 4.7M KWH

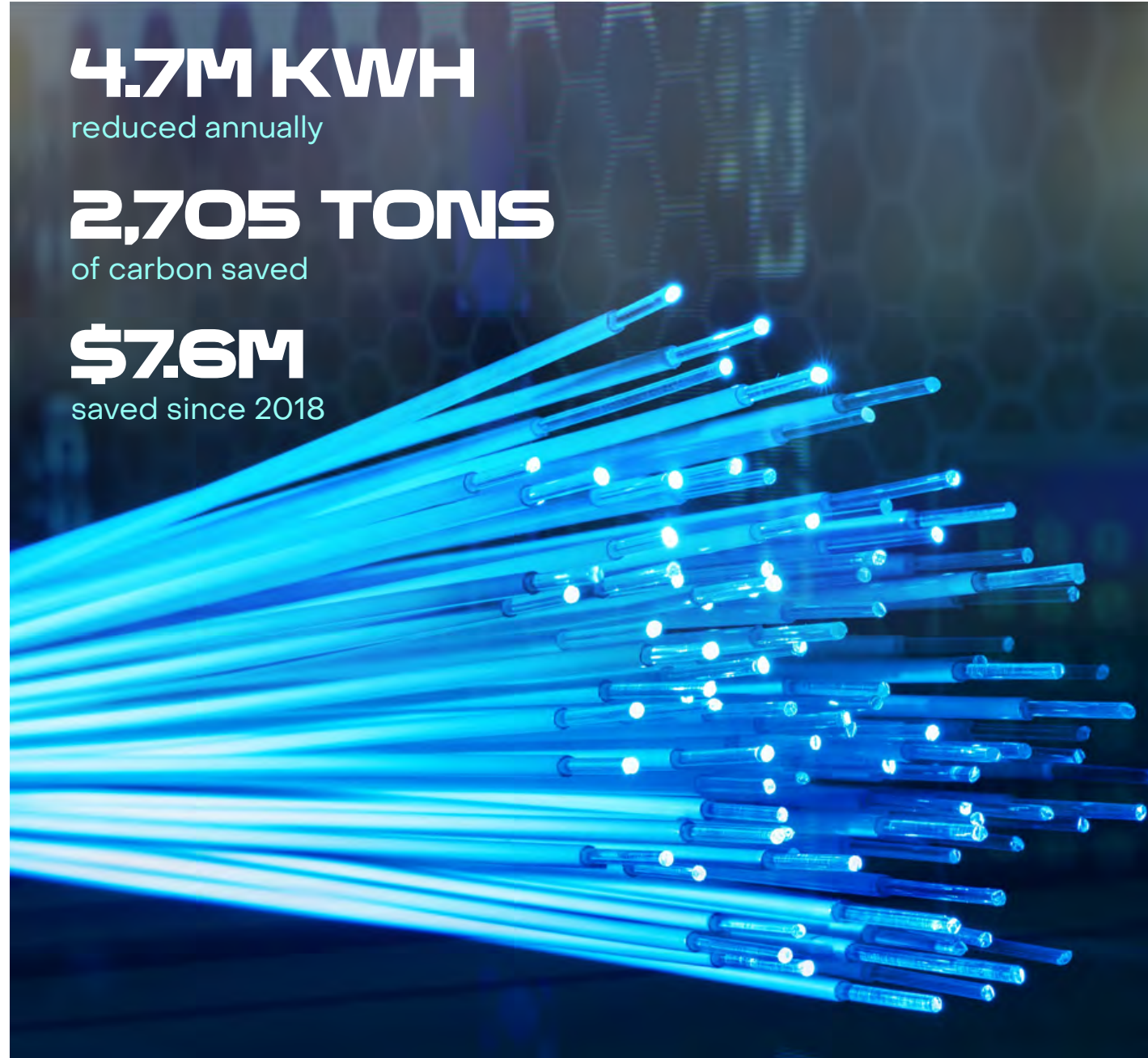
reduced annually

# 2,705 TONS

of carbon saved

# \$7.6M

saved since 2018



# ESTABLISHING FRONTIER GREEN INITIATIVES



**As we transform and change the shape of our business, sustainability is top of mind. From our processes to our physical footprint, we have been proactive in developing different goals to make our company increasingly sustainable.**

## **Our New Dallas Hub**

One of our exciting achievements in 2022 was the redesign of our Dallas Hub, which will complete construction in 2023. This new office space reflects our innovative and inclusive culture with sustainability at the forefront. Its open floorplan is a much more efficient utilization of workspace. Sustainable amenities include EV charging stations, bike racks, bottle filling stations, reusable glassware and cutlery and energy-efficient lighting. Over time, we plan to upgrade all our major city hubs, modeled after Dallas, to reflect our commitment to sustainability.

## **Simplifying Our Real Estate Portfolio**

Our real estate portfolio is made up of thousands of properties across 25 states, including leased, owned and specialized network facilities. To streamline our operations, identify cost savings opportunities and improve the sustainability of our footprint, we partnered with Newmark, a world leader in commercial real estate. Newmark's business intelligence technology platform will deliver data analytics and insights to optimize our real estate portfolio in alignment with our fiber-first strategy.



## Reducing Waste and Energy

After setting a goal on Earth Day 2022, we succeeded in reducing more than 1,000 tons of waste by the end of the year.

Since 2021, we've reduced nearly 1.5 million kWh in energy use by optimizing LED bulbs across 33 locations. In 2023, we plan to upgrade six more facilities with LED lighting systems.

## Incentivizing Paperless Billing

Every day, more customers switch from paper to electronic billing, reducing their carbon footprints as they help us reduce ours. Going paperless also saves our customers money. In 2021, we implemented a \$5 per month discount for customers who enrolled in autopay with paperless billing. We continued this discount in 2022 and increased it to \$10 for customers buying certain speeds. We also implemented a \$2.99 paper bill fee to encourage electronic adoption. Since 2021, the number of customers who are now enrolled in paperless and autopay has doubled and we have reduced the number of those receiving a paper bill by 50 percent.



# GREENING OUR FLEET

Fleet replacement is not a luxury; it is a necessity. We want our fleet to reflect our business as a tech company, with advanced safety technologies, better fuel savings and minimal repair and maintenance costs. Regular fleet replacement is a win all around.

In 2021, we ordered more than 1,500 vehicles with a focus on optimized fuel efficiency, EV options and the development of hybrid power options. This order also included e-transit vans, giving us an opportunity to evaluate upfits and plan for a charging infrastructure. In 2022, additional vehicle orders factored in EV and hybrid options.

In February 2023, team members celebrated the rollout of our first EV installation and maintenance vans in Torrance, California. With less fuel waste and fewer GHG emissions, these EV vans will save about 5,100 gallons of gasoline in one year.

By 2025, our fleet will include more than 180 EV vans, 70 of which we plan to add in 2023 in California, Texas, Connecticut and Florida. Our goal is to have 25 percent of our urban installation and maintenance vans fully electric by the end of 2025 in those states.

## 25%

fully electric by the end of 2025

## 1,500 VEHICLES

ordered in 2021, with a focus on optimized fuel efficiency

## 390,000 GALLONS

of fuel saved annually with telematics





**SPOTLIGHT****Leveraging Data to Save Fuel**

We partnered with Samsara, a fleet telematics provider, to identify ways to optimize fuel efficiency and reduce fuel costs across our fleet. Strategies include optimizing driver behavior and rerouting drivers during heavy traffic or unexpected road delays.

In 2022, we installed telematics across 70% of our fleet. We expect all 8,100 vehicles in our fleet to be installed with telematics by spring 2023. Through this program, we estimate an annual reduction of nearly 390,000 gallons of fuel—or 7.6 million pounds of carbon.

**Contributing to a Safer Environment**

**“The new vans have much more capacity on the inside. It helps us with productivity and it's safer for the environment. We're decreasing GHG emissions and saving an estimated 5,100 gallons of fuel each year in Torrance, California.”**

**— Torrance Team Member**



# REDUCING OUR CARBON FOOTPRINT

We are building a network that emits fewer GHG emissions than historic telecommunication infrastructure.

## Setting Our Baselines

In 2022, we focused on driving future emission reductions in alignment with guidelines from the Environmental Protection Agency (EPA). The EPA defines Scope 1 emissions as direct GHG emissions that occur from sources that are controlled or owned by an organization. Scope 2 emissions are indirect GHG emissions associated with the purchase of electricity, steam, heat or cooling. Last year, we established our baselines for Scope 1 and 2 emissions. The next step in our journey is to identify science-based targets with realistic deadlines.

## Emission Reducing Strategies

We made progress in 2022 on our three primary initiatives to reduce our GHG emissions:

- **Actively sourcing more renewable-energy options**
- **Exploring Virtual Power Purchase Agreements**
- **Installing solar panels and natural gas fuel cells in key markets**





# SOCIAL



We are transforming from the inside out and creating an inclusive workplace where team members can thrive as we carry out our purpose of Building Gigabit America.

# BROADBAND FOR GOOD



## Advancing Digital Inclusion

Our new social impact program, [Broadband for Good](#), was developed to embody our purpose of Building Gigabit America and our commitment to advancing digital inclusion. It answers the fundamental question, “How do we take our fiber technology—our superpower—into the communities we serve and do good?” By using our fiber technology and resources to connect more communities to the digital society, we are

empowering people with the tools and resources that will help shape a future where the possibilities are limitless.

The first community location to benefit from our Broadband for Good program, The Boys & Girls Clubs of the Brazos Valley, is committed to creating future leaders and offers underserved youth in the community a safe place to learn, grow and play.



**“We have an important role to play in enabling an inclusive, digital society. Our Broadband for Good program helps us advance our purpose by using our tech for good. Our program supports organizations working to bridge the digital divide and address other critical needs. The ambition for the program is to stretch our imagination of what’s possible with the power of our technology.”**

– Nick Jeffery, President and CEO



# CREATING A GREAT PLACE TO WORK

No matter where our team members work, we are all focused on bringing the best experiences to our customers, and that starts with making Frontier a great place to work. Frontier has invested in creating a work environment and culture where team members thrive because they feel supported, challenged, respected and rewarded. It is a place where people can grow professionally and become leaders who inspire transformative results.

From designing open work environments like our Dallas Hub that further transparency and encourage collaboration and quick decision-making, to developing internal programs and extensive resources for attracting and keeping top talent, we are determined to better the work experience for our team members. This approach has earned us awards along the way, including Best Place to Work, Best Places for Working Parents and four official Military Friendly designations.



## 2022 Best Place to Work

Our Dallas Hub was named a 2022 Best Place to Work by the Dallas Business Journal. We are transforming from the inside out and creating a workplace where team members can thrive as we carry out our purpose of **Building Gigabit America**.



# #TRANSFORMTOGETHER

## Listening, Learning and Transforming Together

Soliciting continuous feedback has accelerated our successful turnaround and helped us transform together.

Starting in 2021, we asked all team members to challenge the way we work—to question our policies and our processes and how we could make them better. Nothing was off-limits. Through our Dumb Policies program, team members identified the areas that slow down or complicate our work.

Because this initiative was so successful, we launched a new crowdsourcing initiative in 2022 to help simplify the way we do things: Keep It Simple, Stupid—or KISS. Team members pointed out Frontier processes that were overly complex and provided suggestions to simplify them.

## Crowdsourcing for Company-Wide Cost Savings

In late 2022, we relaunched a crowdsourcing initiative—Frontier 50—to identify \$50 million in cost savings. In 2021, Frontier 20 was originally launched to identify \$20 million in cost savings. In 2022, team members submitted 3,300 ideas, which more than doubled the target amount, resulting in \$50 million dollars in cost savings.

**3,300 IDEAS**  
submitted by team members

**\$50 MILLION**  
in cost savings identified



## Recognizing the Most Outstanding Builders of Gigabit America

Changemakers is a new recognition program that allows team members to nominate each other when they see individuals living our purpose and going above and beyond expectations in one of the four Frontier Way categories. Winners are awarded every quarter followed by the announcement of a Changemaker of the Year.

### The Frontier Way

We earn  
customer  
loyalty

We get  
it done  
together

We do  
what we say  
we will do

We  
create the  
future

## Welcome to the Gigaverse and Yammer/Viva Engage

Critical to the success of programs like Changemakers, becoming a great place to work and, ultimately, the transformation of our company is how effectively we communicate. In 2022, we launched The Gigaverse, our robust intranet with the latest news, events, updates, teammate stories and extensive resources. We also rolled out Yammer/Viva Engage, a fun and easy-to-use channel for staying connected, sharing ideas and celebrating each other.



# TAKING CARE OF OUR OWN

## Enhancing Employee Benefits

Nothing is more important to our success than the people driving it. This is why we offer competitive pay and a [comprehensive benefits package](#). Employees enjoy health and welfare benefits that extend to same-sex domestic partners, along with paid time off policies, parental leave and 401(k) matching programs. Benefits for our unionized employees are determined by their respective collective bargaining agreements.

## Helping One Another Recover

After the devastation wreaked by Hurricane Ian in September of 2022 throughout Florida and the Carolinas, many team members inquired about how they could directly help coworkers who were severely impacted.

We launched the Employee Relief Fund to help our team members recover from natural disasters and

catastrophic events. The grant seed is designed to be easily accessible for both those who want to donate and those who need the funds. The funds awarded to qualified recipients are treated as grants and do not have to be paid back. In addition, the company matches each team member's donation up to \$50,000.

### New benefits added in 2022, and effective as of January 1, 2023, include:

- Increased Parental Leave**  
 We increased parental leave from six to 10 weeks for all employees.
- Virtual Physical Therapy (PT)**  
 For non-union employees and covered dependents participating in the Anthem medical plans, this program offers access to our virtual PT program anywhere, anytime to support back and joint health, prepare for surgery and recover from injury.
- Adoption Assistance Program**  
 Non-union and select union team members can receive up to \$10,000 coverage to assist with the cost of adoption.
- Mindfulness Program**  
 Available to all employees and their family members, this program helps build skills to manage stress and anxiety, improve sleep, sharpen focus and enhance overall well-being.





## Standing By Our Veterans

We hold the talents and experiences of our military veterans in the highest regard. We work with the Department of Defense in the areas of Employer Support of the Guard and Reserve (ESGR) and Public Private Partnerships (P3s). We also support Wounded Warrior Project, Operation Gratitude, K9s for Warriors and Work for Warriors.

## Unique Benefits for Veterans

In addition to competitive pay and a wide array of promising opportunities for military veterans, we offer the rewards they deserve. This means competitive pay, education and awareness training, accommodations for specific needs and six months of pay differential for call to active duty.

## Celebrating Military Service

We are proud to have over 1,600 veterans at Frontier and have been recognized as a Military Friendly employer. Veterans Day was celebrated with a panel featuring some of our veterans and hosted by our CEO to discuss the veteran experience, what service means and transitioning to the civilian workforce. We also signed the Statement of Support for the National Guard and Reserve units as an advocate of employee participation in the military.

We are committed to supporting veterans and we recently received four Military Friendly<sup>®</sup> designations, including Military Friendly Employer, Military Friendly Brand, Military Friendly Company and Military Friendly Supplier Diversity Program.



“The U.S. Army provided me the foundation of preparedness to be successful in a multitude of roles with Frontier.”

— Anthony Weekly, U.S. Army

“Since departing the military, Frontier has been instrumental in strengthening my strong leadership foundation, dedication to teamwork and putting the success of the organization above myself.”

— Thai Nguyen, U.S. Marine Corps

“I chose to work at Frontier because it was an amazing opportunity, not only for me to work in my hometown, but to also be an integral part of a company that is leading the way in communications technology.”

— Renita Morriar, U.S. Army

# FOCUSING ON SAFETY



**“Helping ensure the safety and well-being of our people is always a priority. More than half of our team members work in the field and in challenging physical environments. We want them to be safe, protected and prepared, no matter what. That is why we have been rigorous in establishing and constantly reassessing practices to ensure we all have the right training to stay safe.”**

– Alan Gardner, Chief People Officer

## THE FRONTIER FIVE

One of the hard and fast rules we stand by is that no job is so important and no service is so urgent that you can't take the time to do the work safely. We believe in that rule so much that we launched a new way of looking at safety.

We identified five foundational safety practices from feedback shared by our technicians, engineers and other professionals whose work involves physically demanding activities.

We call these core safety practices The Frontier Five.



**Take the time to do the job safely; your safety is too important to rush.**



**Use PPE correctly whether it's a hard hat, harness, ladder, strap, gloves or mask.**



**Stretching is key before you make big moves; know the moves you need to avoid injuries.**



**Look before you proceed to make sure everything is safe and secure.**



**Drive without distractions; never text and drive, use your apps or take calls.**



## Tracking Our Safety Progress

We continuously review monthly scorecards, which include a breakdown of incidents by type, cause, geographic location, management group (all levels, from EVP to the front-line local supervisor), objects involved (e.g., tools, ladders or motor vehicles) and whether an injury resulted in lost time. We compare our performance against the Bureau of Labor Statistics for our industry category and research data and practices in similar industries to help with our assessments and, along with team-member feedback, to make improvements.

Our commitment to safety is guided by our Occupational Safety & Health Program and reinforced by our Environmental Health and Safety Manual. Together, they provide a framework for identifying, controlling and reducing risks.

## Monthly Safety Training and More

In 2022, more than 90 percent of monthly safety training and quarterly critical skills training was completed on time, a 50 percent increase over 2021. We attribute these positive results to a safety program that encourages feedback, tracks completions, holds management accountable for updates and improvements and has strong executive support.

## 2022 KPI Highlights

Our continuous assessments are showing demonstrative results with a year-over-year decrease in injury rates and other safety-related areas:

OSHA  
injury rate:

**5%**  
decrease

Lost time  
injury rate:

**16%**  
decrease

Preventable motor  
vehicle accident rate:

**4%**  
decrease

Project claim  
costs:

**5%**  
decrease

## A Comprehensive Technician Training Program

We provide our field technicians with a comprehensive and continuous training program that starts with a minimum of 160 hours of training—over 60 of which are focused solely on safety best practices. This training includes:

**20+ HOURS**

web-based instruction covering safety and installation topics

**40+ HOURS**

instructor-led pole climbing and ladder safety

**60+ HOURS**

role-specific training on Frontier fiber-optic service methods and procedures

**40+ HOURS** (minimum)

specific on-the-job training related to their new work role

# CHAMPIONING DIVERSITY, EQUITY AND INCLUSION

We consider ourselves true champions of a culture that embraces diversity, equity and inclusion (DEI) at Frontier. It is evident across all aspects of our organization, from our corporate offices to our network engineers and field technicians to our supply chain. Like our customers and our communities, our team members and partners represent the rich mosaic that makes up America.

## Starting From the Top

Our Board of Directors and executive leadership team reflect more gender and racial diversity than ever before in the company's history. With women making up 100% of our technology leadership team and 36% of our executive leadership team, we will continue to break down discriminatory barriers in the workplace and lead by example.



## Executive Committee



**Nick Jeffery**  
President and Chief Executive Officer



**Scott Beasley**  
EVP, Chief Financial Officer



**Veronica Bloodworth**  
EVP, Chief Network Officer



**Etienne Brandt**  
EVP, Commercial



**Vishal Dixit**  
EVP, Strategy & Wholesale



**Alan Gardner**  
EVP, Chief People Officer



**John Harrobin**  
EVP, Consumer



**Erin Kurtz**  
EVP, Chief Communications Officer



**Charlon McIntosh**  
EVP, Chief Customer Operations Officer



**Mark Nielsen**  
EVP, Chief Legal & Regulatory Officer



**Melissa Pint**  
EVP, Chief Digital Information Officer



## An Advisory Council Representing an Array of Viewpoints

Our Gigaboard Advisory Council was created to help develop a future-proof digital infrastructure that exceeds the expectations of our customers. It is composed of a diverse team of thinkers, doers and innovators across various industries who dream big about what the future of connectivity looks like. Through different viewpoints and opinions, we aim to ensure every customer viewpoint is considered to help shape technologies and solutions that continue to lead the industry and stay ahead of shifting demands.



**“While I have been at the center of some of the most high-profile brand transformations in the media and entertainment industry over the past 20 years, this one might be the most exciting. We have been challenged to think differently and to believe that no idea is too big—I can’t wait to see the output.”**

– Linda Ong, Gigaboard member and CEO + Co-Founder of Cultique



Rei Inamoto



Joel Lunenfeld



Josh McManus



Linda Ong



Sarah Unger



Cornell Verdeja-Woodson



Faris Yakob

## Strengthening Our DEI Pillars

When the executive leadership team was complete in 2022, a unanimous decision was made to hire a passionate advocate who would execute a well-calibrated strategy that would strengthen our DEI pillars and enrich our purpose-led culture.

As a result of our new driving force behind DEI, we were able to substantially improve education and engagement compared to the previous year. Highlights include:

- Introduced a performance management system and trained 2,081 team members and 964 people managers on bias in performance management and inclusive hiring practices
- Launched a [veterans program](#) to attract more military veteran candidates
- Launched a new DEI spotlight series called “Just by Looking at Me” where team members shared about special aspects of their identity and personal experiences

## SPOTLIGHT

### Meet Dr. Marlette Jackson, Head of DEI



A Texas Aggie alum who earned her doctorate from Stanford and contributes insights on DEI topics to Harvard Business Review, Forbes and other business publications, Dr. Jackson was hired last year to champion DEI at Frontier. Before joining Frontier, she held leadership positions at Stanford University's

School of Engineering, UT Southwestern Medical Center and Virgin Pulse. In the short time she has been at Frontier, she has already been instrumental in heading initiatives, events and policy changes that have made an impact in the short time she has been at Frontier.

## SPOTLIGHT

### “Just by Looking at Me” Series

A former captain in the U.S. Army, Jeff Houser spent nine years as a Human Resources and Operations leader before joining our team in 2022 to launch our Military Program. At Frontier, Jeff helps our 1,800+ veterans build meaningful careers and bring our purpose to life. You wouldn't know it by looking at him, but for the past 15 years, Jeff has struggled with attention-deficit/hyperactivity disorder (ADHD). With the support of family, he was able to overcome the challenges of ADHD and found ways to

use it to his advantage. While commissioned in the United States Army, he excelled in the high-pressure situations faced during overseas deployment, and his agility with multitasking became an indispensable career skill.

His ADHD now helps him to deliver exceptional performance and inspire his team members on overcoming adversity and creating a more inclusive environment.



## Elevating Diversity in the Recruiting Process

In 2022, we piloted a new recruiting process where each recruiter provides a hiring manager with a slate of qualified candidates from underrepresented backgrounds. Depending on the level of the role, every hiring slate includes a minimum number of Black, Indigenous, People of Color (BIPOC) and women candidates for hiring managers and interview panelists to consider. We also use Gender Decoder to remove gender bias from job descriptions.



### Early Career Investment

We created a new program to attract and develop early-career talent. Through this program, we are helping our interns develop the skills and experiences needed to compete in the job market. Of the 20 interns who completed our 10-week program in summer 2022, 80% identified as women and/or people of color.

From this group, we offered 65% of our interns the opportunity to either work for Frontier full-time or return for a second internship, depending on where they were in their studies. This program has been extremely successful in attracting talent from underrepresented backgrounds and we plan to continue scaling its development.

### Finding Untapped Talent

We partnered with the Learning Alliance Corporation (LAC), a minority-owned business that trains technicians through its Broadband Digital Installer Program for positions in the telecom industry. Last year with LAC, we hosted an information session and conducted on-site interviews. We worked with hiring managers to interview 90% of the December 2022 LAC cohort, hiring 20% of trainees. We value this partnership not only because it helps us find skilled technicians in remote locations, but it also allows us to tap into underrepresented, non-traditional talent pools.



## Inclusion in Action

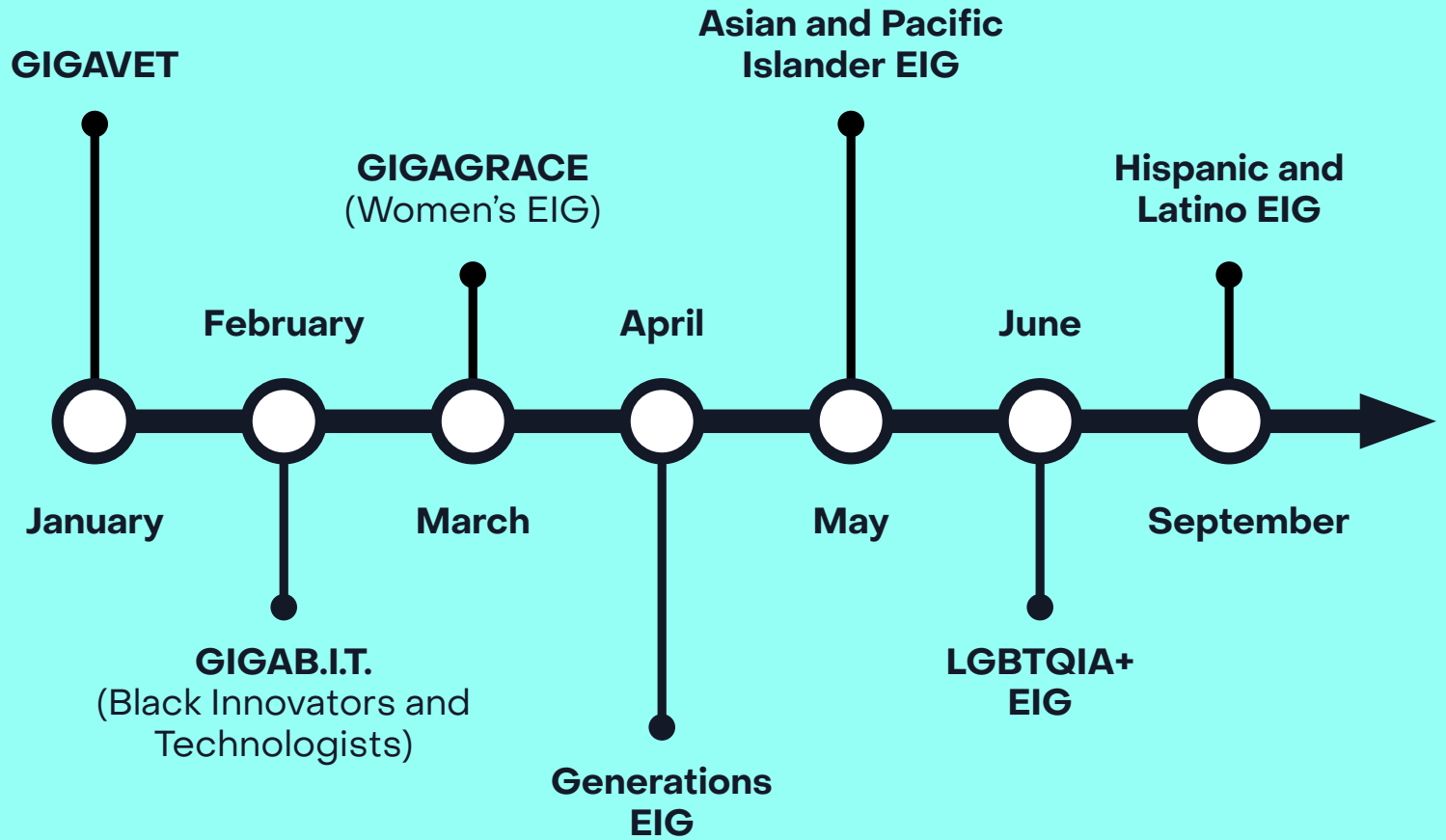
We honor the histories and identities that are important to our team members. Our Employee Celebration Campaign continues to strengthen our corporate culture with a steady cadence of DEI communications and events that reflect, educate and inspire our workforce. In 2022, the following celebrations were promoted internally and externally:

- Black History Month
- Women’s History Month
- Asian American Pacific Islander Heritage Month
- Pride Month
- Juneteenth
- Hispanic and Latino Heritage Month
- Veterans Day

Determined to provide a workplace where team members feel seen, heard and valued, we began launching Employee Impact Groups (EIGs) with their corresponding heritage months in early 2023. In addition to fostering a culture of inclusion and innovation, EIGs will contribute to our overall business strategy and serve as a useful resource for recruiting talent from underrepresented backgrounds, retaining and advancing team members and building beneficial business relationships with customers, suppliers and our communities. More EIGs will be added throughout the year.

## 2023 Employee Impact Groups Launch

On January 26, 2023, we announced our EIGs for the upcoming year.



## Building Powerful Relationships with Our Suppliers

We are focused on casting the widest net we can when it comes to sourcing partners, and continually seek new opportunities to work with business owners who are women, veterans, minorities, LGBTQIA+ or disabled. To ensure we are giving everyone an opportunity to partner with us, we have launched an online [portal and supplier tracking database](#) for easy access to certified diverse supply partners.

We've also established the Frontier Supplier Diversity Council. Composed of members from our Executive, Procurement and Supplier Diversity teams, this group leads our collaboration efforts with community-based organizations in support of Minority and Woman-Owned Business Enterprises, Veteran-Owned Business Enterprises and Lesbian, Gay, Bisexual and Transgender-Owned Business Enterprises.



### Taking the Lead in California

- Ranked **No. 1 in Diversity** by the California Public Utilities Commission (CPUC) in the Telecom/Broadband category.
- The only company in the Telecom/Broadband category to **achieve all CPUC goals** for procurement from women-, minority-, LGBT-, disabled- and veteran-owned businesses.
- Ranked **No. 2 in Diversity spend for the state of California**. This is the fifth year in a row that we have ranked in the top 10. We are the only Telecom/Broadband Utility company to rank in the top 10.

# GOVERNANCE

We consider good governance essential to driving our success and building long-term sustainable value for our stakeholders.



# CORPORATE GOVERNANCE: LEADING WITH INTEGRITY

Our Board and senior leadership team are committed to strong corporate governance, which promotes the long-term interest of our stockholders, enhances management and Board accountability and builds stakeholder trust. The Board's principal role is to promote the best interests of Frontier and its stockholders by overseeing the management of the business and the affairs of the company.

In November 2022, the Board reviewed and enhanced its independent leadership structure with the appointment of Kevin Beebe to serve as the Board's first Lead Independent Director. The Board believes this creates a logical point for independent director feedback to be captured and communicated to the Executive Chairman and CEO and reflects the maturing operational and governance framework of the company.

The Board has three standing committees: the Audit Committee, the Compensation and Human Capital Committee and the Nominating and Corporate Governance Committee. These committees operate under written charters and are responsible (together with the full Board, as appropriate) for overseeing the

management of the company's business and operations, including impacts on the economy, environment and people.

The Board works collaboratively with the executive team, meeting regularly and spending significant time engaging in discussions to understand the strategic challenges and opportunities for Frontier. It provides valuable insight and risk oversight that

helps guide management's decision-making on strategic, operational and cultural changes.

We continually review governance practices, regulatory obligations, the rules and listing standards of the NASDAQ Exchange and SEC regulations, as well as best practices suggested by recognized governance authorities. [Learn more about the members of the Board of Directors.](#)

## A Board of Directors with Distinction

7 of 9

directors are  
independent

4 of 9

directors  
are women

100%

of standing committees  
are composed exclusively of  
independent directors

## ESG and Risk Management

The Nominating and Corporate Governance Committee has primary oversight of ESG matters. This includes reviewing and monitoring the development and implementation of the material policies and goals Frontier may establish from time to time with respect to ESG and sustainability matters.

As ESG encompasses a broad set of potential risks and opportunities, multiple committees play a role in ESG-related matters. For example, together with management, the Compensation and Human Capital Committee reviews risks related

to human capital management, including the company's compensation policies and practices. The audit committee, among other things, oversees cybersecurity-related risks and business continuity planning.

As part of good governance and Board effectiveness, continuing education and briefs on key topics are provided periodically to the Board. The Board works with the executive team to identify appropriate key topics to be briefed on, including those related to ESG and other sustainable development initiatives.

Management is responsible for Frontier's risk management activities, including the annual Enterprise Risk Management (ERM) process, which is jointly administered by the Chief Financial Officer and the head of Internal Audit. ESG risks are also included as part of the ERM process. Each member of the executive team and his or her direct reports participate in an annual identification, assessment and evaluation of enterprise-level risks. For each such risk, one or more mitigation strategies are developed and implemented to minimize or manage that risk.





# CODE OF ETHICS: DOING BUSINESS THE RIGHT WAY

The Code of Ethics explains in clear and easily understandable terms how employees should operate on a day-to-day basis. Ultimately, it is up to each team member to act ethically, with integrity, and to exercise personal accountability. We expect all team members to adhere to our Code of Ethics and follow applicable policies, laws and regulations. Directors, officers and business partners are also expected to abide by our Code of Ethics, as are our subsidiaries, affiliates, agents, vendors, representatives, contractors and consultants.

All team members participate in annual ethics training and completion is required for access to our network. Training modules are updated annually, and topics covered include IT security awareness, anti-harassment and the appropriate use of social media.

## Reporting Potential Ethics Violations

Employees are expected and encouraged to raise any questions or concerns related to possible illegal or unethical conduct, including violations of the Code of Ethics. Raising concerns promptly helps the company respond quickly, avoid escalation of an undesirable

situation, prevent such behavior in the future and protect our reputation for integrity. Frontier maintains a third-party-managed Ethics Hotline that permits the reporting of potential violations of our Code of Ethics or other concerns. Employees can report anonymously via the Ethics Hotline 24 hours a day, seven days a week.

Hotline submissions are reviewed and investigated as appropriate, and the results of all investigations are reported to senior management, and in certain cases, the Audit Committee. Anyone can report good faith concerns about misconduct or potential violations of law and/or participate in internal investigations without fear of retaliation.

## Maintaining Competitive Behavior

We are committed to complying with applicable competition laws (also called antitrust laws). We aim to outperform our competitors fairly with hard work, superior service and great products. To underscore this commitment, we expect employees to be honest, lawful and respectful when interacting with competitors.

## Supporting Human Rights and Labor

We have a responsibility to respect and protect human rights. As a matter of policy, we provide reasonable working hours and fair wages for those who work on our behalf and we respect the rights of workers to join or not join labor unions. Approximately 70 percent of our workforce is covered by collective bargaining agreements. We have a zero-tolerance policy for the use of forced labor or human trafficking practices and never knowingly do business with subcontractors, business partners and suppliers who violate these policies.

We are also committed to creating and maintaining a diverse and inclusive work environment that emphasizes treating every person with dignity and respect. We are intentional in our work to ensure equal opportunities for success in all aspects of employment. Supporting legal policies include Frontier's Diversity Policy, Equal Employment Opportunity Policy, Accommodations and Non-Harassment Policy, Reasonable Accommodations, Harassment in the Workplace and Safe Environment.



# DATA SECURITY AND PRIVACY

Safeguarding the data and trust of our customers is fundamental to our business, and we continually monitor and upgrade our abilities to maintain this commitment. These measures include the use of leading data frameworks, regular training and strategic investments. During 2022, we made significant advancements related to data security, including the formation and organization of our new security team headed by our Chief Information Security Officer.

Data privacy and security are also top of mind for our Board. The Audit Committee has primary responsibility for overseeing Frontier's risk management program relating to data privacy and security. This committee also monitors our compliance in the areas of data and privacy protection. Our Chief Digital Information Officer leads a semi-annual review and discussion (one with the Audit Committee and one with the full Board) dedicated to Frontier's cyber risks, threats and protections. Updates are provided throughout the year, as needed.



## A New Cybersecurity Team for a New Frontier

We know that effective cybersecurity depends on careful deployment of technology, processes and people. In the age of digitization, threats are no longer limited to a few devices. We believe that the only way for our cybersecurity team to be successful is to ensure that they are not only given the level of responsibility and training needed to do the job, but also that they get the top-level support needed to execute effectively. In 2022, we hired a new Chief Information Security Officer and a team of experienced cybersecurity and privacy professionals to oversee this effort.

Cybersecurity has grown in complexity to the point that sub-specialties have emerged. To best protect our business, our cybersecurity team designs, builds and provides secure solutions enterprise-wide. We also have another team of experts embedded within each business unit. These team members provide “boots on the ground” assistance, executing security capabilities and monitoring the ever-evolving landscape for threats within their divisions.

## Protecting Data Privacy

Our [privacy policy](#) informs customers about how we collect, use, share and protect their information in relation to our services. It also governs the information we collect from website visitors and describes choices we provide customers regarding the use of their information.

One of the most difficult tasks for any organization is to identify where sensitive data resides within the enterprise. Frontier has invested in technology to develop this capability and is in the process of cataloging structured data within our databases. We are continually reviewing existing controls to ensure they are sufficient to protect data privacy. Any new or emerging security risks to data privacy are reviewed and escalated through leadership to mitigate damage.

## Securing Information and Networks

As part of our continuing efforts to improve our overall information security capabilities, we follow the framework established by the National Institute of Standards and Technology (NIST): Identify, Detect, Protect, Respond and Recover. This framework was developed with input from more than 1,000 different entities, including government and academic organizations, and reflects the leading cybersecurity practices of the telecommunications industry. Our information security program is focused on protecting sensitive and restricted data, network infrastructure and its related systems.

## 24/7 Cybersecurity Operations Center

We maintain a 24/7 Cybersecurity Operations Center (CSOC). The CSOC consists of multiple teams who respond to events such as phishing emails and virus alerts received by users and monitor intelligence from public intelligence sources, government sources and commercial intelligence resources.

The teams use this intelligence to conduct regular “Threat Hunting” missions within the Frontier enterprise using “Indicators of Compromise” (IOCs), as well as “Tools, Techniques and Processes” (TTPs) to search for attack activity throughout the network. They also identify and detect threats like network anomalies and attacks on the perimeter (including exploit attempts and Distributed-Denial-of-Service (DDOS) attacks).

We have next-generation Endpoint Detection and Response (EDR) agents installed on servers and workstations across the enterprise to further aid detection and protection. In 2022, we scaled our endpoint protection to ensure every endpoint is protected.

## Employees Remain Our Best Line of Defense

We can only be successful if we have everyone equipped, engaged and informed about the tools that can keep us safe.

To help employees protect themselves and Frontier, we offer awareness opportunities including: annual training, phishing exercises and regular bulletins and advisories that stress the importance of data privacy and a month-long awareness campaign. Our goal is to educate our employees about suspicious activities and to provide them with the knowledge to protect themselves in case of attack.

# 100%

of employees participate in cybersecurity awareness exercises and training



**“The measures we're taking to improve our cybersecurity and increase team member awareness are key to our digital transformation and future-proofing Frontier for success.”**

– Melissa Pint, Chief Digital Information Officer

## Cybersecurity Awareness Month Success

Our focus in 2022 was to raise awareness around cybersecurity—and to make it fun. Throughout the month of October, we educated employees about different aspects of cybersecurity and engaged them through email and our internal social media platform, Yammer. We shared security tips and training and engagement exercises that included pop quizzes and contests with prizes. It was one of our most successful internal campaigns of the year. We had

thousands of people engaging on a regular basis, answering polls and providing comments and feedback.

Next year, we plan to build on the momentum we created and develop targeted education and training for specific departments, such as developers, management and customer support. Different jobs require different defense strategies and we look forward to working with individual groups to build an even stronger team.



# DATA & REPORTING





# FRONTIER ESG DATA

## Financial Data<sup>1</sup>

### Operational Data (in millions, USD)

	2021	2022
<b>Revenue</b>		
Total revenue	\$6,411	\$5,787
<b>Net Income</b>		
Operating income (loss)	\$1,113	\$595
Net income (loss) <sup>2</sup>	\$4,955	\$439
<b>Operating Expenses</b>		
Total operating expenses	\$5,298	\$5,192
Cost of service	\$2,362	\$2,166
Selling, general and administrative	\$1,668	\$1,745
Depreciation and amortization	\$1,240	\$1,182
Restructuring costs and other changes	\$28	\$99

<sup>1</sup> For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup> For 2021, data represents a combination of the Predecessor and Successor companies. Net income for 2021 includes Reorganization Items of \$4,171 million.

## Workforce Data

### Workforce Demographics<sup>1</sup>

	2021	2022
<b>Total Employment</b>		
<b>Total employees<sup>2</sup></b>	<b>15,641</b>	<b>14,712</b>
Female	4,025	3,560
Male	11,616	11,152
<b>Employment Level</b>		
Sr. management	415	424
All other staff	4,460	4,288
Union	10,766	10,000

### Employee Turnover and Rate<sup>1</sup>

	2021	2022
<b>Employee Turnover</b>		
<b>Total</b>	<b>1,589</b>	<b>2,050</b>
<b>Employee Turnover Rate (%)</b>		
<b>Total</b>	<b>10%</b>	<b>13%</b>

<sup>1</sup> For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup> Data represents all Frontier full-time employees (FTEs). Does not include employees on unpaid leaves.



## Diversity Data

	BIPOC <sup>3</sup>		White <sup>4</sup>	
	2021	2022	2021	2022
<b>Racial/Ethnic Composition of U.S. Workforce and Board of Directors<sup>1</sup></b>				
<b>U.S. Workforce (%)</b>				
<b>Total U.S. workforce<sup>2</sup></b>	<b>28.2%</b>	<b>29.2%</b>	<b>71.8%</b>	<b>70.8%</b>
Sr. management	0.5%	0.7%	2.1%	2.1%
All other staff	8.0%	8.6%	20.5%	20.6%
Union	19.7%	19.9%	49.2%	48.0%
<b>U.S. Workforce Female (%)</b>				
<b>Total U.S. workforce</b>	<b>9.1%</b>	<b>8.7%</b>	<b>16.6%</b>	<b>15.5%</b>
Sr. management	0.2%	0.3%	0.6%	0.7%
All other staff	3.2%	3.2%	8.0%	7.6%
Union	5.8%	5.2%	8.0%	7.2%
<b>U.S. Workforce Male (%)</b>				
<b>Total U.S. workforce</b>	<b>19.1%</b>	<b>20.6%</b>	<b>55.1%</b>	<b>55.2%</b>
Sr. management	0.4%	0.5%	1.5%	1.4%
All other staff	4.8%	5.3%	12.5%	13.0%
Union	13.9%	14.7%	41.2%	40.9%
<b>Board of Directors (%)</b>				
Board of Directors (%)	33%	33%	66%	66%

<sup>1</sup> For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup> Data represents all Frontier full-time employees (FTEs).

<sup>3</sup> BIPOC (Black, Indigenous and People of Color).

<sup>4</sup> Includes "Not declared" employees.

## Workforce Data

### Training and Development<sup>1</sup>

	2021	2022
<b>Training Hours</b>		
Average hours per employee	13.2	12.8
<b>Training Hours by Employee Category</b>		
Average hours of training/year for management <sup>2</sup>	7.2	5.7
Average hours of training/year for non-management <sup>3</sup>	13.8	16.2
<b>Performance Reviews (%)</b>		
Percent employees receiving regular performance and career development reviews	N/A <sup>4</sup>	100% <sup>5</sup>

### New Employee Hires<sup>1</sup>

	2021	2022
<b>New Hires</b>		
<b>Total</b>	<b>1,027</b>	<b>1,081</b>

<sup>1</sup> For year ended December 31. All data provided is self-reported and voluntary in disclosure.

<sup>2</sup> Data applies to people leaders.

<sup>3</sup> Data applies to non-people leaders.

<sup>4</sup> Career development reviews were not tracked in 2021 due to bankruptcy. Union workforce reviews were dictated by CBA in 2021.

<sup>5</sup> 100% of our non-union population received performance reviews. Union workforce reviews were dictated by CBA in 2022.



# GLOBAL REPORTING INITIATIVE INDEX

## General Disclosures

Disclosure	Location or Comment
<b>1. The Organization and Its Reporting Practices</b>	
2-1 Organizational details	Frontier Communications (Frontier) is a publicly traded American telecommunications company headquartered in Norwalk, Connecticut, and incorporated in the state of Delaware. Frontier is a provider of communication services in the United States, with approximately 3.1 million consumer customers, 2.8 million broadband customers and 14,700 employees operating in 25 states.
2-2 Entities included in the organization's sustainability reporting	The entities included in sustainability reporting are the same as those in our financial reporting.
2-3 Reporting period, frequency and contact point	January 1, 2022 to December 31, 2022 Annual reporting Erin Kurtz, Chief Communications Officer, Erin.Kurtz@FTR.com
2-4 Restatements of information	We reported total new employee hires in last year's report, which excluded certain new hire terminations during the year. To be consistent with how we will report moving forward, we have revised the 2021 number in this report.
2-5 External assurance	This report is not assured externally.
<b>2. Activities and Workers</b>	
2-6 Activities, value chain and other business relationships	Sector: Telecommunications Activities: Internet service provider Value chain and other business relationships: <a href="#">2022 Frontier Communications 10-K Item 1. Business</a>
2-7 Employees	<a href="#">Workforce Data, p. 43</a>
2-8 Workers who are not employees	<a href="#">Workforce Data, p. 43</a>



## General Disclosures (continued)

### Disclosure

#### 3. Governance

2-9	Governance structure and composition	Governance, Corporate Governance: Leading with Integrity, p. <a href="#">35</a>
2-10	Nomination and selection of the highest governance body	<a href="#">2023 Frontier Communications Proxy Statement</a>
2-11	Chair of the highest governance body	Governance, Corporate Governance: Leading with Integrity, p. <a href="#">35</a>
2-12	Role of the highest governance body in overseeing the management of impacts	Governance, Corporate Governance: Leading with Integrity, pp. <a href="#">35-36</a>
2-13	Delegation of responsibility for managing impacts	Governance, Corporate Governance: Leading with Integrity, pp. <a href="#">35-36</a>
2-14	Role of the highest governance body in sustainability reporting	Governance, Corporate Governance: Leading with Integrity, pp. <a href="#">35-36</a>
2-15	Conflicts of interest	Governance, Code of Ethics: Doing Business the Right Way, p. <a href="#">37</a> <a href="#">Nominating and Corporate Governance Committee Charter</a> <a href="#">Corporate Governance Guidelines</a> <a href="#">Supplemental Provisions of Code of Business Conduct and Ethics</a>
2-16	Communication of critical concerns	Governance, Code of Ethics: Doing Business the Right Way, p. <a href="#">37</a>
2-17	Collective knowledge of the highest governance body	Governance, Corporate Governance: Leading with Integrity, p. <a href="#">35</a>
2-18	Evaluation of the performance of the highest governance body	The annual Board evaluation process is designed and overseen by the Nominating and Corporate Governance Committee and the Executive Chairman. The evaluations are designed to elicit candid input and discussion and to generate actionable enhancements to Board and Committee functions.
2-19	Remuneration policies	<a href="#">2023 Frontier Communications Proxy Statement</a>
2-20	Process to determine remuneration	<a href="#">2023 Frontier Communications Proxy Statement</a>
2-21	Annual total compensation ratio	For 2022, the ratio of our annual total CEO compensation to the median annual total compensation of all our employees (other than the CEO) as described below, commonly referred to as the "CEO Pay Ratio," was 384 to 1. We determined that the 2022 median annual total compensation of all our employees who were employed as of December 31, 2022, other than our CEO, was \$38,373 which reflects a \$41,000 decrease in pension value due to interest rate changes. Without regard to the change in pension value, the ratio would be 186 to 1.

## General Disclosures (continued)

### Disclosure

#### 4. Strategy, Policies and Practices

2-22	Statement on sustainable development strategy	A Letter from Our CEO, p. <a href="#">3</a>
2-23	Policy commitments	Governance, Corporate Governance: Leading with Integrity, pp. <a href="#">35-36</a> <a href="#">Corporate Governance Guidelines</a>
2-24	Embedding policy commitments	Governance, Code of Ethics: Doing Business the Right Way, p. <a href="#">37</a>
2-25	Process to remediate negative impacts	Environment, pp. <a href="#">9-18</a> Governance, Code of Ethics: Doing Business the Right Way, p. <a href="#">37</a>
2-26	Mechanisms for seeking advice and raising concerns	Governance, Code of Ethics: Doing Business the Right Way, p. <a href="#">37</a>
2-27	Compliance with laws and regulations	Governance, Corporate Governance: Leading with Integrity, pp. <a href="#">35-36</a> Frontier closely monitors compliance with laws and regulations and takes affirmative steps to maintain compliance to the fullest extent possible. Frontier does not believe there were any significant instances of non-compliance with laws or regulations in 2022 or that any fines had a material financial impact.
2-28	Membership associations	<ul style="list-style-type: none"> <li>· Fiber Broadband Association</li> <li>· Global Women's Innovation Network</li> <li>· Telecommunications Association of the Southeast</li> <li>· Iowa Communication Association</li> <li>· RLEC Industry Association</li> <li>· New Mexico Exchange Carriers Group</li> <li>· Nevada Telecommunications Association</li> <li>· Ohio Telecommunications Association</li> <li>· Pennsylvania Telephone Association</li> <li>· USTelecom</li> <li>· Wisconsin State Telecommunications Association</li> </ul>

#### 5. Stakeholder Engagement

2-29	Approach to stakeholder engagement	We engage with all stakeholders through different channels and with varying frequency. Regular channels for engaging with stakeholder groups include surveys, written communication and interviews.
2-30	Collective bargaining agreements	68.2% of our workforce is covered by collective bargaining agreements.

## Material Topics

### Disclosure

3-1 Process to determine material topics [About Frontier, Our Commitment to ESG, p. 7](#)

3-2 List of material topics [About Frontier, Our Commitment to ESG, p. 7](#)

### GRI 302: Energy 2016

3-3 Management of material topics [Environment, pp. 9–18](#)

302-4 Reduction of energy consumption [Environment, pp. 9–18](#)  
We have collected baseline information, and we plan to begin reporting on our energy consumption and reduction strategies next year.

302-5 Reductions in energy requirements of products and services [Environment, Building Energy-Efficient Fiber Networks, pp. 11–13](#)

### GRI 305: Emissions 2016

3-3 Management of material topics [Environment, pp. 9–18](#)

305-5 Reduction of GHG emissions [Environment, pp. 9–18](#)  
We have collected baseline information, and we plan to begin reporting on our emission reduction strategies next year.

### GRI 401: Employment 2016

3-3 Management of material topics [Social, Taking Care of Our Own, pp. 24–25](#)

401-1 New employee hires and employee turnover [Workforce Data, p. 43, 45](#)

401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees [Social, Taking Care of Our Own, pp. 24–25](#)  
We provide medical coverage to all eligible part-time, temporary and seasonal employees working 30 hours or more per week. All employees, regardless of hours worked, are offered EAP.  
[Benefits at Frontier](#)

401-3 Parental leave [Social, Taking Care of Our Own, p. 24](#)  
[Benefits at Frontier](#)



## Material Topics (continued)

### Disclosure

#### GRI 403: Occupational Health and Safety 2018

3-3	Management of material topics	Social, Focusing on Safety, pp. <a href="#">26-27</a>
403-1	Occupational health and safety management system	Social, Focusing on Safety, p. <a href="#">27</a>
403-3	Occupational health services	Social, Focusing on Safety, p. <a href="#">27</a>
403-5	Worker training on occupational health and safety	Social, Focusing on Safety, p. <a href="#">27</a>
403-6	Promotion of worker health	Social, Focusing on Safety, p. <a href="#">26</a>
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Social, Focusing on Safety, pp. <a href="#">26-27</a>

#### GRI 404: Training and Education 2016

3-3	Management of material topics	Social, Focusing on Safety, pp. <a href="#">26-27</a>
404-1	Average hours of training per year per employee	Workforce Data, p. <a href="#">45</a> Social, Focusing on Safety, p. <a href="#">27</a>
404-2	Programs for upgrading employee skills and transition assistance programs	Social, Focusing on Safety, p. <a href="#">27</a>
404-3	Percentage of employees receiving regular performance and career development reviews	Workforce Data, p. <a href="#">45</a>

#### GRI 405: Diversity and Equal Opportunity 2016

3-3	Management of material topics	Social, Championing Diversity, Equity and Inclusion, pp. <a href="#">28-33</a>
405-1	Diversity of governance bodies and employees	Workforce Data, p. <a href="#">44</a>

#### GRI 418: Customer Privacy 2016

3-3	Management of material topics	Governance, Data Security and Privacy, pp. <a href="#">38-40</a>
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	If there were confirmed material cybersecurity breaches, they are disclosed in our 10-k filing.

# SUSTAINABILITY ACCOUNTING STANDARDS BOARD INDEX

## Telecommunication Services

SASB Code	Accounting or Activity Metric	2022 Disclosure
<b>Environmental Footprint of Operations</b>		
TC-TL-130a.1	(1) Total energy consumed, (2) Percentage grid electricity, (3) Percentage renewable	We are collecting baseline information, and we plan to begin reporting on our energy consumption next year.
<b>Data Privacy</b>		
TC-TL-220a.1	Description of policies and practices relating to behavioral advertising and customer privacy	Frontier updates customer data pertaining to our footprint on a monthly basis. That data include basic demographic information for prospect (non-customer) households as well as customers. Frontier also receives behavioral data that provide more socio-economic information as well as the attitudes and usage of media and telecommunications products. Frontier also uses audiences within advertising platforms such as Google and Facebook to be able to provide differentiated, creative messaging and offers, though those audiences are not typically driven by Frontier's first party data. <a href="#">Frontier Privacy Policy</a>
TC-TL-220a.2	Number of customers whose information is used for secondary purposes	Frontier utilizes anonymized customer data, no personally identifiable information (PII), in several ways. These anonymized video viewership data are sold to partners to be used for viewership planning tools and attribution studies. Anonymized IP data are also internally and externally used for retargeting for digital advertising. For our household addressable video advertising, we use anonymized customer IDs to identify specific target segments by a third party (e.g., Experian and Liveramp), and through our advertising management system, we input that segment file and display a specific commercial in the target segment household when the STB is on and tuned to a specific network. For our geographic zone video advertising, we use ZIP codes of video customers to build specific geographic zones for local ad insertion, running the same commercial over the entire geographic target.
TC-TL-220a.3	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Frontier had zero monetary losses associated with customer privacy proceedings in 2022.
TC-TL-220a.4	(1) Number of law enforcement requests for customer information, (2) Number of customers whose information was requested, (3) Percentage resulting in disclosure	In 2022, Frontier received 3,647 requests from law enforcement for information associated with 4,690 accounts. Frontier provided the requested information for all accounts for which we had data.

**Telecommunication Services (continued)**

SASB Code	Accounting or Activity Metric	2022 Disclosure
<b>Data Security</b>		
TC-TL-230a.1	(1) Number of data breaches, (2) Percentage involving personally identifiable information (PII), (3) Number of customers affected	Frontier has not experienced any data breaches over the past 12 months related to PII.
TC-TL-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Frontier maintains a risk and compliance unit within the cybersecurity program that reviews and approves data security risks. This process includes reviews of exception request to our security policy and reviews and approvals of privilege access requests. Additional risk assessments are performed on new projects. Frontier aligns with the NIST cybersecurity framework and uses a questionnaire drawn from the framework to highlight potential risks with new vendors and SOW/MSA contracts where customer data may be exposed or received for processing by the prospective vendor.
<b>Product End-of-Life Management</b>		
TC-TL-440a.1	(1) Materials recovered through take back programs, percentage of recovered materials that were (2) Reused, (3) Recycled, and (4) Landfilled	Percent asset refurbished: ~64% The percentage of targeted assets returned from the field that were refurbished and reutilized.  Percent refurbished utilization: 15% The percentage of overall shipments to the field that were refurbished devices (reutilized assets).
<b>Competitive Behavior &amp; Open Internet</b>		
TC-TL-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behavior regulations	Frontier closely monitors the potential anticompetitive behavior of its competitors and takes affirmative legal or regulatory action to challenge or mitigate the impact of such activity on its business. Frontier does not believe anticompetitive behavior had a material financial impact on the company in 2022.
TC-TL-520a.2	Average actual sustained download speed of (1) Owned and commercially-associated content and (2) Non-associated content	Frontier participates in the Federal Communications Commission (FCC) Measuring Broadband America Fixed Broadband Report and has speed test results published in the report. The report can be found on the FCC website.
TC-TL-520a.3	Description of risks and opportunities associated with net neutrality, paid peering, zero rating, and related practices	The largest risks relate to potential changes by the FCC or State regulations. Changes in either organization can create regulatory uncertainty, which can potentially result in more aggressive regulatory requirements related to Internet service, net neutrality and related policies.



**Telecommunication Services (continued)**

SASB Code	Accounting or Activity Metric	2022 Disclosure
<b>Managing Systemic Risks from Technology Disruptions</b>		
TC-TL-550a.1	(1) System average interruption frequency and (2) Customer average interruption duration	<p>The average Customer Outage Hours for fiber customers was 185,000 with an average customer downtime of seven minutes per customer per month (0.02%) and an uptime of 99.98%.</p> <p>The average Customer Outage Hours for Copper customers was 3,045,152 with an average customer downtime of 36 minutes per customer per month (0.11%) and an uptime 99.89%. Some outage hours were excluded due to force majeure events that impacted Frontier customers.</p> <p>While we strive to minimize interruptions and their impact on our customers, we have implemented measures to manage systemic risks from technology disruptions such as regular system maintenance, monitoring and incident response plans.</p>
TC-TL-550a.2	Discussion of systems to provide unimpeded service during service interruptions	Frontier implements hundreds of projects each year focused on enhancing our network diversity and resiliency along with weekly reviews of capacity to ensure uninterrupted service. As part of this process, new geo redundant network POPs were established in California, Texas and Connecticut to eliminate single points of failure along with significant capacity growth to support our customer's needs. We also completed projects to replace all internet peering infrastructure with new high density distributed routers, which allowed us to better diversify traffic between our internet partners along with doubling our previous capacity.
<b>Activity Metric</b>		
TC-TL-000.A	Number of wireless subscribers	Frontier does not have wireless subscribers.
TC-TL-000.B	Number of wireline subscribers	This information is confidential.
TC-TL-000.C	Number of broadband subscribers	<p>As of December 31, 2022, number of subscribers:</p> <ul style="list-style-type: none"> <li>· Copper Broadband: 1,689,000</li> <li>· Fiber Broadband: 1,180,000</li> <li>· Total Broadband: 2,868,000</li> </ul>
TC-TL-000.D	Network traffic	This information is confidential.